

**BITTIGER ELIAS
TRIOLO & DIEHL**
Attorneys at Law

MEMO ENDORSED

Priscilla J. Triolo, Esq.
ptriolo@bittigerelias.com

Please reply to New Jersey office

12 Route 17 North, Suite 206
Paramus, New Jersey 07652

P: 201.438.7770 F: 201.438.5726

February 6, 2025

Via ECF

Hon. Jessica G.L. Clarke, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 1040
New York, New York 10007

Application GRANTED. The parties' deadline to file their joint Rule 56.1 statement is HEREBY EXTENDED until **February 17, 2025**. No further extensions will be granted, particularly given the parties were required to file the joint statement months ago. The parties are further reminded that pursuant to this Court's Individual Rules and Practices, extensions must be requested at least 48 hours prior to the relevant deadline. The Clerk of Court is respectfully directed to terminate ECF No. 66.

Re: **Mason Tenders District Council Welfare Fund, et al. v. Blade Contracting, Inc.**
Case No.: 22-cv-09609-JGLC-SLC

Dated: February 7, 2025
New York, New York

SO ORDERED.

Jessica Clarke

JESSICA G. L. CLARKE
United States District Judge

Dear Judge Clarke:

This firm represents Blade Contracting, Inc. in the above-referenced matter. Pursuant to Your Honor's Order of January 27, 2025, the parties were to file a joint Rule 56.1 statement on or before February 7, 2025.

Please accept this correspondence as defendant's request for a ten (10) day extension of the aforementioned deadline until February 17, 2025. Plaintiffs' counsel provided this office with a proposed Rule 56.1 statement. Unfortunately, I was scheduled to participate in a Trial in Hudson County on February 6, 2025 and, due to trial preparation, was unable to review and respond to the proposed statement in advance of tomorrow's deadline. Because of the weather, my Trial has now been moved to February 12, 2025. Further, based upon a brief review of the statement, there are numerous citations that have to be confirmed and revisions that need to be proposed to counsel prior to the submission of the statement to the Court.

This shall confirm that this is the first request for an extension of the aforementioned deadline. This shall further confirm that I have discussed this request with counsel for plaintiffs, Richard Hermer-Fried, Esq., and he consents to this request.

Please do not hesitate to contact this office if Your Honor has any questions or concerns with regard to this request. As always, the Court's courtesies and consideration of this matter are greatly appreciated.

Respectfully submitted,

Priscilla J. Triolo, Esq.
PRISCILLA J. TRIOLO, ESQ.

PJT/alr

cc: Richard Hermer-Fried, Esq. (via ECF)